

# SAFEGUARDING POLICY



## SAFE02 Client Feedback and Complaints Policy

### 1. PURPOSE

This policy outlines the management and resolution of Client Feedback and Complaints by Bedford Services and Advisory Limited (BSA).

### 2. SCOPE

This Policy covers all Feedback or Complaints raised by, or on behalf of Clients regarding BSA's Client Service Delivery including:

- Supported Employment Services
- Supported Independent Living Services
- Day Options & Experiences Services
- Service Billing
- Liaison/co-ordination with external support providers
- Compliance with the NDIS Quality & Safeguards Commission
- Compliance with Privacy Law

Except:

- Customer Product Complaints
- Staff Grievances

This Policy is to be read in conjunction with:

- BSA Client Feedback and Complaint Procedure [SAFE02.1]
- BSA Client Incident Management Policy [SAFE01] and Procedure [SAFE01.1]
- BSA Client Critical Incident Policy [SAFE03] and Procedure [SAFE03.1]
- COR-29 Whistleblower Policy

### 3. POLICY

BSA supports the rights of Clients, their families, carers, guardians, or advocates to provide input on how services are designed and delivered. BSA encourages Feedback and Complaints from all Clients and stakeholders, ensuring a transparent, fair, and confidential process. Feedback and Complaints can be submitted anonymously.

BSA has established a robust Feedback and Complaints management system to ensure effective and timely resolution, complying with relevant legislative requirements and obligations under the NDIS Quality and Safeguards Commission, NDIS Code of Conduct, and NDIS Practice Standards.

Clients are informed of BSA's Feedback and Complaint Policy through regular communication and documentation, including Service Agreements, Client handbooks where applicable, yearly reviews, visual materials such as posters, engagement at Client engagement meetings and Bedford's Website. All staff members are adequately trained in BSA's Feedback and Complaint procedures.

#### **Key Features of the Feedback and Complaint System:**

- Accessible information for Clients and their Advocates on providing Feedback or lodging Complaints.
- The ability to submit Feedback or Complaints anonymously.
- Timely resolution of Feedback and Complaints.

- Formal Complaints are managed by BSA's Safeguarding Team to ensure impartiality and procedural fairness.
- Compliance with legislative requirements and obligations under the NDIS Quality and Safeguards Commission, NDIS Code of Conduct, and NDIS Practice Standards.
- Annual review of the Feedback and Complaints system as part of BSA's internal auditing processes.
- Effective recording, reporting, and monitoring processes to drive continuous improvement.
- Regular reporting of Feedback and Complaints to BSA Executive, Service Governance Committee, and the Board, and to the NDIS Commissioner upon request.
- Documentation related to Feedback and Complaints retained for seven years from the date of record creation.
- Complaints about the Chief Executive Officer, are to be managed by an external body, as appointed by the Board.

### **Client Experience:**

When a Client or their Advocate provides Feedback or makes a Complaint, BSA ensures:

- Acknowledgment and serious consideration of their concerns, with dignity and respect.
- Adequate support, including the option to contact a support person.
- Opportunities to express desired outcomes.
- Clear explanations of the Feedback and Complaint process and expected actions, provided verbally and/or through relevant materials such as the Easy Read Feedback and Complaint Handout.
- Regular updates on the status of any investigation.
- Protection of privacy and confidentiality unless legal obligations require otherwise.
- Communicate the conclusion of the investigation and, if appropriate, disclose any outcomes whilst respecting the privacy of all individuals involved.
- Information on external resources for escalating Complaints, such as the NDIS Quality and Safeguards Commission.

## **4. DEFINITIONS**

- **Advocate/Support Person:** A person assisting a Client in providing Feedback or making a Complaint and supporting them during the investigation process.
- **BSA Client:** A person with a disability receiving a service from BSA, including former Clients, supported employees, supported students, residents, and those accessing any BSA services.
- **BSA Service:** Any disability support service provided by BSA.
- **Complaint:** An expression of dissatisfaction with circumstances or events related to BSA services.
- **Feedback:** Compliments, criticisms, comments, or suggestions where a response is not sought or expected.
- **NDIS:** National Disability Insurance Scheme.
- **NDIS Quality and Safeguards Commission:** External regulator for registered NDIS providers.
- **NDIS Code of Conduct:** Promotes safe and ethical service delivery by setting expectations for NDIS providers and workers.
- **Service Agreement:** A written agreement between a registered NDIS provider and a person with a disability outlining the supports/services to be provided and their payment.
- **Staff:** Any person engaged by BSA to provide services or support, including paid or unpaid workers, board members, volunteers, relief staff, labour hire workers, student placements, or those supporting Clients but not employed by BSA.

## **5. ASSOCIATED FORMS, POLICIES & PROCEDURES**

- Choice & Advocacy Policy
- Client Feedback and Complaint Management Procedure
- Client Incident Management System Policy & Procedure
- Privacy, Dignity, Confidentiality & Data Integrity Policy/Procedure
- BSA Easy Read Feedback and Complaints Procedure

- Feedback Form
- Feedback and Complaint Poster

**6. RELEVANT LEGISLATION AND RESOURCE MATERIAL**

- National Disability Insurance Scheme Act 2013
- National Disability Insurance Scheme (Complaints Management & Resolution) Rules 2018
- National Disability Insurance Scheme (Code of Conduct) Rules 2018
- National Disability Insurance Scheme (Provider Registration & Practice Standards) Rules 2018
- NDIS Commission Complaints and Feedback Policy
- NDIS Quality & Safeguards Commission Complaints Management & Resolution Guidance (Version 2.1, September 2019)
- NDIS Quality & Safeguards Commission Practice Reviews – A Framework for NDIS Providers (December 2020)
- Effective Complaint Handling Guidelines for NDIS Providers
- Privacy Act 1981